

THE HONORABLE LAUREN KING

UNITED STATES OF DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

LEO'S WELDING and FABRICATION, LLC, a
Washington limited liability company

Plaintiffs,

v.

HANNAH, Official Number 1067457, her
machinery, engines, equipment, cargo
appurtenances, *in rem* and SAYAK
LOGISTICS, LLC, an Alaska limited liability
company dba NORTHLINE SEAFOODS *in*
personam

Defendants.

Case No. 2:25-cv-00625-LK

DECLARATION OF BENJAMIN
BLAKEY

I, BENJAMIN BLAKEY, declare as follows:

1. I am over the age of 18, am competent to be a witness and make the following declaration based on my personal knowledge. I am a director for Defendant Sayak Logistics, LLC (hereinafter "Sayak") in the above captioned matter.

2. This declaration is submitted in support of Defendant Sayak Logistics, LLC's Motion for Relief from having to oppose Plaintiff's Summary Judgment.

3. The HANNAH is a large floating barge, 400 feet long and 100 feet wide ("Barge").

1. 4. The Barge's home port is in Bellingham, WA.

2. 5. The Barge was designed for use in the annual Bristol Bay salmon season
3. in Alaska. The Barge receives salmon from various catcher vessels and freezes and
4. stores it. The Barge' first season in 2024. The Bristol Bay fishing season starts in late
5. June or early July and is usually completed by late July or early August. This year, the
6. Barge left Bellingham for Bristol Bay on May 26, 2025, and is expected to be back in
7. Bellingham, WA in the second part of August, depending on the fishing season and the
8. weather.

9. 6. Because the Barge operates in Alaska only two-three months out of a year,
10. those are the busiest, most time-demanding, and essential to the business months in
11. operations, with little time to spare for anything else.

12. 7. Plaintiff Leo's Welding and Fabrication, LLC ("Leo") participated in the
13. conversion of the Barge before the 2024 salmon season. The Barge conversion took
14. place up to the date that the Barge left for the 2024 Bristol Bay season.

15. 8. Thomas Singer, Sayak's Director of Vessel Operations, was the most
16. senior engineer/construction manager during the conversion process. He oversaw Leo's
17. work during that time, as well as work by other contractors.

18. 9. Thomas Singer is currently on the Barge in Bristol Bay addressing various
19. engineering and operational issues. He is expected to remain on the Barge until the
20. salmon season is over and is expected to address any issues once she returns to
21. Bellingham.

22. 10. My understanding is that Mr. Singer had some issues with work and/or
23. materials provided by Leo's and that he himself or *via* his subordinates communicated his
24. concerns to Leo's in some fashion. However, I am not aware of the details such as
25. specific deficiencies, conversations, notices, or individuals involved.

1.
2. I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE
3. STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.


4.
5. DATED at Bellingham, Washington this 1st day of August, 2025

6. 
7. Benjamin Blakey

8.
9.
10.
11.
12.
13. CERTIFICATE OF SERVICE

14.
15. The undersigned certifies under penalty of perjury
16. of the laws of the State of Washington that, on the
17. 1st day of August 2025, the foregoing was electronically filed
with the Clerk of Court using the CM/ECF system,
which will send notification of such filing to the following:

18. Attorneys for Plaintiff:
19. Brian C. Zuanich, WSBA #43877 - brian@zuanichlaw.com
20. Robert Zuanich, WSBA #9581- rpz@zuanichlaw.com
21. Zuanich Law PLLC
U.S. Bank Center
1420 5th Avenue, Suite 2200
Seattle, WA 98101

22. 
23. Holly H. Mote